

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INDEX No. 13CV2800 (GBD) (KFN)

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GALLIE DOSSOU,

**AFFIDAVIT OF
MICHAEL MENSAH ABRAMPAH**

Plaintiff,

-against-

REYER PARKING CORP., GERALD LIEBLICH,
FDD ENTERPRISES, INC., and ALI DAR,

Defendants.
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MICHAEL MENSAH ABRAMPAH, being duly sworn hereby declares under the penalty of perjury as follows and pursuant to CPLR §2106:

1. I am currently employed by REYER PARKING CORP. and FDD ENTERPRISES, INC. and I work at multiple parking garages in the Bronx, Queens, and New York County. Mostly, I work in the Bronx. This includes 1872 East Tremont Avenue, Bronx, New York (the "Premises").

2. I began working for REYER PARKING CORP. and FDD ENTERPRISES, INC. on January 15, 2010 and am still working with the company as of today.

3. As of today, I work six (6) days a week, twelve (12) hours a day, for a total of seventy-two (72) hours per week. I receive one (1) day off per week. I am paid four hundred twenty-five dollars (\$425.00) per week.

4. When I first started in January 2010 I was working seven (7) days a week up to or about July 2014. During January 2010 to July 2014, I was paid \$400.00 per week and had one (1) day off per month.

5. The owners of FDD ENTERPRISES, INC. and REYER PARKING CORP. are FAYAZ KAHN and ZAFAR INGUMIOE. I know they are the owners because their names are on the parking registrations in the office. Additionally, I deal with both of these men on a daily basis. I speak to both of these men every day.

6. The managers of FDD ENTERPRISES and REYER PARKING CORP. are ALI MUSTAFA and ALI AMAR. I believe ALI AMAR's legal name is ALI DAR; however, I am not certain. These two (2) men are responsible for paying me.

7. In or about January 2011, DOSSOU GALLIE PINONVI, who we referred to as "KOBI," began working with FDD ENTERPRISES, INC. and REYER PARKING CORP. at the Premises for FDD ENTERPRISES/REYER PARKING.

8. To be clear, KOBI began working with me at the Premises in or about January 2011. I am aware the Defendants are claiming that KOBI only worked for them for a few short months; this is a lie. KOBI worked with me at the Premises for over two (2) years. I know this because KOBI worked at night, the shift before me, and I would relieve him each morning when I started my shift. KOBI would work from 7:00 PM to 7:00 AM and I would work 7:00 AM to 7:00 PM.

9. I have also reviewed the "time sheets" produced by the Defendants in this case, indicating that KOBI worked from 9:00 AM to 5:00 PM only. This is impossible as I worked from 7:00 AM to 7:00 PM and KOBI was never there during this time as he worked nights.

10. Also, the companies did not start using these time sheets until after KOBI's lawsuit. They ask us to sign the time sheets, which are presented to us blank, and then fill the hours out later. I have never seen my time sheet filled out, I have only seen the time sheets blank.

11. My job description and KOBİ's job description was working as a valet, parking cars, and attending the parking garage owned and operated by Defendant FDD ENTERPRISES, INC. and REYER PARKING CORP. at their multiple locations.

12. I worked with KOBİ many times during the time we both worked for FDD ENTERPRISES. KOBİ's working hours were the same as mine but he was afforded one (1) day off per month. KOBİ's last day working with FDD ENTERPRISES, INC. and REYER PARKING CORP. was March 6, 2013.

13. The relationship between FDD ENTERPRISES, INC. and REYER PARKING CORP. is ambiguous. At the Premises, there is a sign, which states, REYER PARKING. Additionally, we are provided with a stamp, which says REYER PARKING. When I, or another employee answers the phone at the Premises, we answer "REYER PARKING." I believe that I work for REYER PARKING, INC. and FDD ENTERPRSES, INC.

14. The managers instructed us that the garage at the Premises is called REYER PARKING and that is the way we should answer the phone. The managers also provided us with the stamps, which state REYER PARKING. We were instructed by the managers to use the stamp to stamp the tickets given to customers when they come into the garage at the Premises.

15. In or about January 2014 FAYAZ KHAN approached me and asked me to tell KOBİ's attorneys that I "do not know" how many hours I work because there is no proof of how many hours I worked. He also told me to offer KOBİ his job back if he dropped the lawsuit against the company. He also claimed that he did not know that KOBİ was fired.

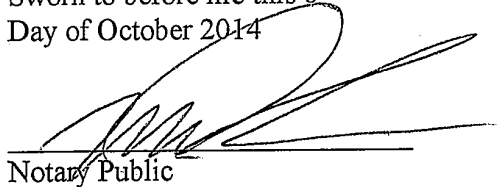
16. I am available for the Court for testimony or any questions that it may have. Although I fear retaliation for providing this affidavit, KOBİ has asked me to tell the truth on his behalf and so I have done so in this affidavit.

Dated: Brooklyn, New York
October 8, 2014



MICHAEL MENSAH ABRAMPAH

Sworn to before me this 8th
Day of October 2014


Notary Public

MICHAEL TIMOTHY CARR
Notary Public, State of New York
No. 02CA6239995
Qualified in Kings County
Commission Expires April 25, 2015